

Dale Kotchka-Alanes  
Nevada Bar No. 13168  
LEWIS ROCA ROTHGERBER CHRISTIE LLP  
3993 Howard Hughes Parkway, Suite 600  
Las Vegas, Nevada 89169  
Tel: 702.949.8200  
Fax: 702.949.8398  
[MKotchkaAlanes@LewisRoca.com](mailto:MKotchkaAlanes@LewisRoca.com)

*Attorneys for Defendant TitleMax of Nevada, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALISIA COBO,

Plaintiff,

vs.

TITLEMAX OF NEVADA, INC.,

Defendant.

Case No. 2:22-cv-01778-GMN-BNW

**DEFENDANT'S UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT  
(THIRD REQUEST)**

Defendant TitleMax of Nevada, Inc. ("TitleMax"), by counsel, requests that the Court extend the time it has to respond to Plaintiff's Complaint up to and including February 15, 2023.

In support of this motion, TitleMax states:

1. Plaintiff filed a Complaint alleging violations the Telephone Consumer Protection Act, 47 U.S.C. § 227. (ECF No. 1.)
2. TitleMax's response to the Complaint is currently due January 16, 2023. However, the parties are currently discussing the merits of the claims, exploring a resolution that could avoid the need for further litigation and TitleMax needs additional time to consider Plaintiff's proposed resolution.
3. Accordingly, TitleMax requests that the Court to extend the time it has to respond to the Complaint to and including February 15, 2023.
4. On January 17, 2023, the Court denied TitleMax's previous motion without prejudice and directed that the motion should indicate if Plaintiff has any objection to the requested extension. (ECF No. 13.) Counsel for TitleMax was unable to reach Plaintiff's counsel prior to

1 filing the original motion, but counsel for TitleMax has since conferred with Plaintiff's counsel  
2 regarding this motion and Plaintiff has no objection to the requested extension.

3 5. This is TitleMax's third request for an extension of time to respond to the Complaint.

4 WHEREFORE, Defendant TitleMax of Nevada, Inc. respectfully requests that the Court  
5 extend the time it has to respond to Plaintiff's Complaint through February 15, 2023

6  
7 Respectfully submitted this 19th day of January, 2023.

8  
9 LEWIS ROCA ROTHGERBER CHRISTIE LLP

10 By: /s/ Dale Kotchka-Alanes

11 Dale Kotchka-Alanes

12 Nevada Bar No. 13168

13 3993 Howard Hughes Parkway, Suite 600

14 Las Vegas, Nevada 89169

15 *Attorneys for Defendant TitleMax of Nevada,*  
16 *Inc.*

17 **ORDER**

18 IT IS SO ORDERED.

19 

20 UNITED STATES MAGISTRATE JUDGE

21 DATED: January 20, 2023

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5, I certify that on this 19th day of January, 2023, I served the foregoing “Defendant’s Unopposed Motion for Extension of Time to Respond to Complaint (Third Request)” through the United States District Court’s CM/ECF filing system.

Michael Kind  
KIND LAW  
8860 South Maryland Parkway, Suite 106  
Las Vegas, Nevada 89123

George Haines  
Gerardo Avalos  
FREEDOM LAW FIRM  
8985 S. Eastern Avenue, Suite 350  
Las Vegas, Nevada 89123

*Attorneys for Plaintiff*

/s/ Luz Horvath  
An employee of Lewis Roca  
Rothgerber Christie LLP

3993 Howard Hughes Parkway, Suite 600  
Las Vegas, NV 89169

**LEWIS  ROCA**